

IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

BRIAN MAHONEY,
Defendant,

v.

United States,
Respondent.

Case Number: 1-11-CR-006-01-JL
2013 JAN 14 12:57

DISTRICT COURT
DISTRICT OF N.H.
FILED

MOTION FOR LEAVE TO FILE A PRO SE PLEADING

NOW COMES, defendant Brian Mahoney, appearing through pro se representation requests leave to proceed pro se for the following reason:

- (1). I am a federal prisoner incarcerated at the Federal Medical Center, Devens at Ayer, Massachusetts.
- (2). I have asked Attorney Andrew R. Schulman to file a Motion To Dismiss on December 18, 2012 on my behalf, but he has refused to file this motion.
- (3). Pursuant to Bucci v. United States, (states that a defendant who ask his attorney to file a motion on his behalf and refuses to file, then it is up to the defendant to make sure that all motion's are filed at his request.
- (4). Pursuant to the Supreme Court case in Strickland v. Washington, (clearly states that all Bar Attorney's MUST represent their clients ethically and in good faith).

WHEREFORE, the defendant Prays that this Honorable Court grant his Motion for Leave to File Pro Se pleadings or grant other relief that is fair, just, and equitable.

Respectfully Submitted,

Brian Mahoney Pro Se

Brian Mahoney #12232-049
Federal Medical Center
Ayer, Ma 01432


CERTIFICATE OF SERVICE

I Brian Mahoney is sending first class postage a copy of this motion to the Federal Prosecutor Arnold H. Huftalen at, United States Attorney's Office, at 53 Pleasant Street, Concord, New Hampshire 03301.

I am also, sending a copy to the Clerk Of Court for filing at the United States District Court in the District of New Hampshire, at 55 Pleasant Street, Concord, New Hampshire 03301. As well as to Attorney Andrew R. Schulman, at 1838 Elm Street, Manchester, New Hampshire 03104.


On this the 8th day of January in the year of 2013, a copy of the foregoing Motion to all parties involved in this matter.

Respectfully Submitted,


Brian Mahoney Pro se
Reg. #12232-049, Unit-N-5
Federal Medical Center
P.O. Box 879
Ayer, Massachusetts 01432

FOOTNOTE:

Could you Clerk Starx please send a copy to prosecutor Arnold H. Huftalen, as well as Attorney Andrew R. Schulman, because I am without the ability to do so myself, and I would like to thank you in advance for your help and cooperation in this matter.


Brian Mahoney Pro se
Reg. #12232-049, Unit-N5
Federal Medical Center
P.O. Box 879
Ayer, Massachusetts 01432